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*Attorneys for Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF OREGON  
 EUGENE DIVISION**

JUDICIAL WATCH, INC.;  
 CONSTITUTION PARTY OF OREGON;  
 SUNI DANFORTH; and HANNAH  
 SHIPMAN,

Plaintiffs,

v.

TOBIAS REED, in his official capacity as the  
 Oregon Secretary of State; and THE STATE  
 OF OREGON,

Defendants.

Civil Action No. 6:24-cv-1783-MC

**DECLARATION OF ROBERT D.  
 POPPER**

\* *Application for admission pro hac vice forthcoming*

Robert D. Popper, for his declaration pursuant to 28 U.S.C. § 1746, deposes and says:

1. I am a senior attorney for Judicial Watch, Inc., and counsel for Plaintiffs in this matter. I make this declaration in opposition to Defendants' motion for summary judgment.

2. Attached as Exhibit 1 is a true and correct copy of the U.S. Election Assistance Commission's (EAC) 2022 Election Administration and Voting Survey (EAVS), which is referred to in the Amended Complaint (ECF 12) at paragraph 23, and is available on the EAC's website at the link provided in that paragraph.

2. Attached as Exhibit 2 is a true and correct copy of an Order Re: Motion to Dismiss, issued by the Hon. Mark C. Scarsi, U.S. District Judge in the Central District of California, on February 11, 2025, in *Judicial Watch, Inc. v. Weber*, Case No. 2:24-cv-03750-MCS-PVC (ECF 34), which is not available on Lexis.

3. Attached as Exhibit 3 is a true and correct copy of an excerpt of the comments of Cong. Swift on the National Voter Registration Act of 1989, from the Congressional Record (136 Cong. Rec. 1242-43 (Feb. 6, 1990)), obtained from Lexis.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: March 7, 2025

/s Robert D. Popper  
Robert D. Popper